

EXHIBIT B

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: DIISOCYANATES ANTITRUST
LITIGATION

This Document Relates to:
All Cases

Master Docket Misc. No. 18-1001

MDL No. 2862

Judge W. Scott Hardy

DEFENDANTS' PROPOSED CASE MANAGEMENT ORDER

Event	Deadline
Oral Argument on Rule 12(b)(2) Foreign Defendants' ¹ Motions To Dismiss ²	April 22, 2025 (completed)
Supplemental Interrogatory Responses by Plaintiffs and Defendants	October 14, 2025
Close of Fact Discovery ³	January 12, 2026
Plaintiffs' Opening Expert Reports (class certification and merits)	February 26, 2026
Defendants' Depositions of Plaintiffs' Opening Experts	March 27, 2026

¹ The Rule 12(b)(2) Foreign Defendants are Covestro AG and Wanhua Chemical Group Co., Ltd. The Non-12(b)(2) Defendants are BASF Corporation, BASF SE, Covestro LLC, The Dow Chemical Company, Huntsman Corporation, Huntsman International LLC, and Wanhua Chemical (America) Co., Ltd.

² In the event the Court denies either of the Rule 12(b)(2) Foreign Defendant's pending Motions To Dismiss, the parties shall within 30 days of that denial submit a joint proposed supplemental case management schedule or competing proposed supplemental case management schedules to address whether any changes should be made to this CMO with respect to the remaining schedule for the Rule 12(b)(2) Foreign Defendants.

³ During fact discovery, the parties may take one (1) deposition of each witness, absent good cause. The parties, however, may seek leave of court to redepose the same individual (within 45 days after the Rule 12(b)(2) Foreign Defendants' document production), and in so doing must specifically identify the individual(s) that they want to redepose, the extremely limited nature of the deposition, and the specific reasons they could not have questioned this individual previously about the topics sought.

Event	Deadline
Defendants' Expert Reports (class certification and merits)	April 13, 2026
Plaintiffs' Depositions of Defendants' Experts	May 12, 2026
Plaintiffs' Rebuttal Expert Reports (class certification and merits)	May 27, 2026
Defendants' Depositions of Plaintiffs' Rebuttal Experts	June 26, 2026
Motion for Class Certification, Motion(s) for Summary Judgment, and Motions Pursuant to Federal Rules of Evidence 702 and 703	July 27, 2026
Responses to Class Certification, Motion(s) for Summary Judgment, and Motions Pursuant to Federal Rules of Evidence 702 and 703	September 24, 2026
Reply Briefs in Support of Motion for Class Certification, Motion(s) for Summary Judgment, and Motions Pursuant to Federal Rules of Evidence 702 and 703	October 26, 2026

SO ORDERED.

Dated: _____, 2025

BY THE COURT:

 Judge W. Scott Hardy
 United States District Judge